

Training Regulations - Instructions and FAQs 2018 Annual General Compliance and FWA Training for Medicare Part D Network Providers

The Centers for Medicare & Medicaid Services (CMS) requires that Providers complete annual General Compliance and Fraud, Waste and Abuse (FWA) training. The annual training is a CMS requirement per Federal Regulations (42 C.F.R. §§ 422.503(b)(4)(vi)(C) and 423.504(b)(4)(vi)(C)) and CVS Caremark Part D Services is responsible for ensuring that all Providers in its Medicare Part D network comply with the requirement. CVS Caremark® therefore requires that all contracted Medicare Part D network pharmacy Providers complete training each year on behalf of its Medicare Part D Prescription Drug Plan (PDP) Plan Sponsors.

Providers must complete Medicare Parts C and D General Compliance and Combating Medicare Parts C and D Fraud, Waste, and Abuse training, including submission of an attestation to CVS Caremark verifying completion of the requirement. ***The training and attestation must be completed by December 31 each year to meet the current year's requirement.*** Failure to comply with this requirement will result in Provider's non-compliance with the Provider Agreement and will result in non-compliance fees being assessed and could potentially subject Provider to disciplinary action up to and including termination.

The following general information will assist your pharmacy to complete the training and attestation correctly and in a timely manner:

- We do not use the NCPDP file listing to verify FWA training attestations. Provider must attest directly with Caremark.
- Failure to comply with this requirement will result in non-compliance with your Provider Agreement, and will subject you to a non-compliance fee of \$1500.00

CVS Caremark provides pharmacy Providers with links to the CMS training website and an attestation process. *Providers will be notified each year by CVS Caremark when the training and attestation for the current year are available.* General Compliance and Fraud, Waste and Abuse training and attestation materials can be accessed on-line at: www.Caremark.com/PharmInfo

The website contains:

- The "CVS Health Code of Conduct" (PDF)
- "CMS General Compliance and FWA Training"
- "CVS Caremark Annual Pharmacy Attestation of Completed General Compliance/FWA Training"
- Training Regulations-Instructions and FAQs

If your pharmacy/organization has been officially accredited as a supplier of Durable Medical Equipment, Prosthetics, Orthotics and Supplies (DMEPOS) by a CMS-deemed accreditation organization (AO) or through enrollment into Parts A or B of the Medicare program and therefore waived from participating in additional FWA training per 42 C.F.R. § 423.504(b)(4)(vi)(C)(3), you must attest to your accreditation and completion of general compliance training by accessing the same link provided above and complete the:

- "CVS Caremark Annual Pharmacy Attestation of Completed General Compliance/FWA Training"

Documentation confirming Provider's completed training (and DMEPOS accreditation or Medicare Parts A or B Program enrollment, if applicable) should be readily available to CVS Caremark, upon request, for audit purposes.

General Timeline for Training and Completing the Attestation

January - December	Providers complete annual General Compliance and FWA trainings
October - December	Providers complete attestation by December 31, 2018
October-December	CVS Caremark reminder notifications sent to Providers
December 31, 2018	Providers must complete training <u>and</u> attestation requirements for 2018 by the end of 2018. See Annual FWA Training and General Compliance Training (GCT) subsection in the Medicare Part D section of the Provider Manual for more information.
January 2019	CVS Caremark notifications are sent to Providers that did not complete training <u>and</u> attestation requirements for 2018
After January 2019	CVS Caremark issues non-compliance fees of \$1500.00 to Providers that did not complete training <u>and</u> attestation requirements for 2018.

Top Questions Asked by Providers

- **I completed the NCPDP Training Attestation, do I still need to complete yours?** Yes, you are still required to complete the CVS Caremark Pharmacy Attestation of Completed General Compliance and FWA Training to ensure you receive credit for complying with your provider agreement with CVS Caremark.
- **Where do I find the training materials on your website?** Once you have accessed the CVS Caremark Pharmacy Webpage (www.Caremark.com/PharmInfo), scroll down to the bottom of the page there you will find a Section titled Medicare Part D Compliance / Fraud, Waste, and Abuse Training for Pharmacy Staff, which includes the CVS Health Code of Conduct, the CMS General Compliance and FWA Training Module Information, and the on-line Attestation for Completed 2018 General Compliance/FWA Training.
- **My pharmacy is accredited as a Medicare Part D Provider. Do I still have to take this training?** If your pharmacy/organization has been officially accredited as a supplier of Durable Medical Equipment, Prosthetics, Orthotics and Supplies (DMEPOS) by a CMS-deemed accreditation organization (AO) or through enrollment into Parts A or B of the Medicare program the FWA portion of your training obligation is waived. **However, you must still attest using the on-line Attestation, and you are still required to complete Medicare Parts C and D General Compliance Training per 42 C.F.R. § 423.504(b)(4)(vi)(C)(3).**
- **I forgot my password on the CVS Caremark Pharmacy Webpage in order to complete the CVS Caremark Attestation?** There is no login or password required to complete the online attestation. To complete access the CVS Caremark Pharmacy Webpage (www.Caremark.com/PharmInfo), scroll down to the bottom of the page there you will find a section titled Medicare Part D Compliance / Fraud, Waste, and Abuse Training for Pharmacy Staff. Click the link to open the on-line Attestation for Completed 2018 General Compliance/FWA Training, and you can begin completing the form. Do not close until you hit Submit at the end.
- **Can I use General Compliance and FWA training from a different Sponsor or entity?** Only CMS Standardized General Compliance and Fraud, Waste and Abuse Training and Education Module training materials may be used to satisfy this annual training requirement. You can satisfy this requirement by using the CMS General Compliance and FWA training modules located on the CMS Medicare Learning Network (MLN) or by adding the CMS General Compliance and FWA training module content on the CMS Medicare Learning Network (MLN) unmodified into a company training.

- **I forgot my password on the CMS Medicare Learning Network (MLN) website, who should I contact?** Go to the LMS home page at <https://learner.mlnlms.com> and select “Forgot your password?” under the “Password” box. Follow the directions on the MLN website or contact MLN@cms.hhs.gov.
- **How do I find the correct version of the training on the CMS Medicare Learning Network (MLN) website?** Once you have logged in to the website, on the right hand side there is a search field. Enter each course individually and click the Search icon. To meet CMS requirements ensure both trainings are completed, **Medicare Parts C and D General Compliance Training** and **Combating Medicare Parts C and D Fraud, Waste, and Abuse Training**.
- **After completing the training on the CMS Medicare Learning Network (MLN) website what documentation will I receive?** A certificate of completion is generated for each training upon passing a short test with a score of 70% or higher at the end of the training module. To meet CMS requirements ensure certificates of completion are generated for both trainings, **Medicare Parts C and D General Compliance Training** and **Combating Medicare Parts C and D Fraud, Waste, and Abuse Training**.
- **My pharmacy does not process Medicare Part D prescriptions or submit Medicare Part D claims. Is the pharmacy still required to take this training?** Regardless of whether your pharmacy has filled prescriptions for Medicare Part D members or submits Medicare Part D claims, as a pharmacy contracted with CVS Caremark to process Medicare Part D claims, you are required to complete the General Compliance and Fraud, Waste, and Abuse Training and attest annually.
- **I have already completed General Compliance and FWA training for my pharmacy. Do I need to complete CVS Caremark’s on-line Attestation?** **Yes. To receive credit for completing your annual General Compliance and FWA training you will need to submit the online Attestation** to CVS Caremark confirming completion of the required training in 2018.
- **Once I have completed the on-line attestation, how do I know if CVS Caremark has received the information?** At the end of the on-line attestation, you may enter an e-mail address and have a copy of the attestation sent to you. Once you submit the on-line attestation, you should also print a copy of the confirmation screen. Please keep a copy for your records.
- **How long do I need to maintain training records?** As part of the Part D Addendum of your provider agreement with CVS Caremark, you have agreed to document your training with materials, attendance logs, date of training, names of trainers and any other information related to the training and maintain these records for a period of ten (10) years, and, upon request, to provide CVS Caremark with copies of these training records for audit purposes.
- **If my pharmacy staff identifies suspected non-compliance or fraud, waste or abuse, how do I report it?** The CVS Health Code of Conduct describes the Compliance Program and provides additional resources for reporting issues, including:
 - Ethics Line: 1-877-CVS-2040
 - Confidential Ethics e-mail: Ethics.BusinessConduct@cvs.com
 - Fraud Hotline: 1-888-277-4149
 - Confidential Fraud e-mail: MedicareFraud@caremarkrx.com
 - Privacy / Security: Privacy.Officer@cvscaremark.com
- Remember, you have an assurance of anonymity and non-retaliation in the reporting process, and confidentiality to the extent reasonably possible.

Pharmacy Checklist for Annual Training and Attestation

Providers must complete Medicare Part D General Compliance/FWA training, including submission of the on-line Attestation to CVS Caremark verifying completion of the requirement. ***The training and attestation must be completed by December 31st, 2018 to meet training requirements for 2018.***

STEPS:

1. Go to www.Caremark.com/PharmInfo or www.caremark.com > Contact CVS Caremark>For Pharmacists and Medical Professionals
2. Scroll to "Fraud, Waste and Abuse Training for Pharmacy Staff"
3. Complete CMS General Compliance and FWA Training Modules (or other third party training)
4. Access and complete the "CVS Caremark Pharmacy Attestation of Completed General Compliance/FWA Training"
5. SUBMIT the Attestation
6. Print a copy for your records